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15 Attorneys for Defendant
16 CIRCA 3, LLC dba amvona.com

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18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN FRANCISCO DIVISION

21 PHOTOFLEX PRODUCTS, INC.,
22 Plaintiff,
23 v.
24 CIRCA 3 LLC dba AMVONA.COM,
25 Defendant.

26 CASE NO. C04 03715 JSW

27
28 **STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINE FOR
FILING MOTION TO STAY**

1 WHEREAS, the Case Management Conference ("CMC") in this matter took place on
2 Friday, December 9, 2005.

3 WHEREAS, at the CMC, the Court set a date of January 31, 2006, as the deadline for
4 filing any Motions to Stay.

5 WHEREAS, Defendant CIRCA 3 LLC dba Amvona.com ("Amvona.com") anticipates
6 that it will file a Motion to Stay in conjunction with its Petition for Re-Examination of the
7 Plaintiff's patent at issue. The Petition for Re-Examination will be based, in part, on Plaintiff's
8 (1) Disclosure of Asserted Claims and Preliminary Infringement Contentions and (2) Document
9 Production Accompanying Disclosure. *See*, Patent Local Rules 3-1 and 3-2, respectively.

10 WHEREAS, Plaintiff served its Disclosure of Asserted Claims and Preliminary
11 Infringement Contentions on Tuesday, January 16, 2006.

12 WHEREAS, Plaintiff has not yet produced its Document Production Accompanying
13 Disclosure, if any, but anticipates doing so, or confirming no additional documents exist, during
14 the week of January 23, 2006.

15 The parties hereby stipulate to and request the following:

16 1. The deadline for filing any Motion to Stay shall be extended to **Tuesday,**
17 **February 21, 2006**, or to a date three weeks after Plaintiff's actual production of its Document
18 Production Accompanying Disclosure, whichever date is later.

19 SO STIPULATED.

20 Dated: January 24, 2006

MOUNT & STOELKER P.C.

21 By _____
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23 Bobby T. Shih for Plaintiff
PHOTOFLEX PRODUCTS, INC.

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1 Dated: January 25, 2006

SEDGWICK, DETERT, MORAN & ARNOLD LLP

2 By _____
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James Yuanxin Li for Defendant
4 CIRCA 3 LLC dba AMVONA.COM

5 **IT IS SO ORDERED.**

6 Dated: January 25, 2006

7 By _____
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Jeffrey S. White
9 UNITED STATES DISTRICT JUDGE

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